

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

TRENT NICHOLS and SHARON
NICHOLS, derivatively on behalf of
COCRYSTAL PHARMA, INC. F/K/A
BIOZONE PHARMACEUTICALS, INC.,

Plaintiffs,

vs.

ELLIOTT MAZA, GARY WILCOX,
JEFFREY MECKLER, GERALD
MCGUIRE, JAMES MARTIN, CURTIS
DALE, RAYMOND SCHINAZI, DAVID
BLOCK, PHILLIP FROST, JANE H.
HSIAO, STEVEN RUBIN, BRIAN
KELLER, BARRY C. HONIG, JOHN
STETSON, MICHAEL BRAUSER, JOHN
O'ROURKE III, MARK GROUSSMAN, and
JOHN H. FORD,

Defendants,

and

COCRYSTAL PHARMA, INC. F/K/A
BIOZONE PHARMACEUTICALS, INC.,

Nominal Defendant.

Case No.: 2:19-cv-16751-KM-JBC

**NOTICE OF TRENT NICHOLS AND
SHARON NICHOLS' UNOPPOSED
MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement; the accompanying Declaration of Timothy Brown and exhibits thereto, including the Stipulation and Agreement of Settlement by and between the parties named herein (the "Stipulation"); and upon all prior papers and proceedings herein, Plaintiffs Trent Nichols and Sharon Nichols (the "Nichols Plaintiffs") will move this Court, before the Honorable Kevin McNulty, at the Martin Luther King Building & U.S.

Courthouse, located at 50 Walnut Street Room 4015, Newark, NJ 07101, on a date and at a time designated by the Court, pursuant to Federal Rule of Civil Procedure 23.1, for entry of the accompanying [Proposed] Order Preliminarily Approving Derivative Settlement and Providing for Notice (the “Preliminary Approval Order”) (a copy of which is attached as Exhibit C to the Stipulation), which will: (i) preliminarily approve the settlement embodied by the Stipulation (the “Settlement”); (ii) approve the form, substance, and requirements of the proposed form of notice to the shareholders of Cocrystal Pharma, Inc. (the “Notice”); (iii) set a schedule for dissemination of the Notice, submission of papers regarding the Settlement and any related award of attorneys’ fees and expenses, and a hearing on the Settlement and; (iv) for such other and further relief as this Court may deem just and proper.

Dated: September 4, 2020

Respectfully submitted,

PAWAR LAW GROUP, P.C.

/s/ Vik Pawar
Vik Pawar
20 Vesey Street, Suite 1210
New York, NY 10007
Telephone: (212) 571-0805
Facsimile: (212) 571-0938
Email: vik@pawarlaw.com

THE BROWN LAW FIRM, P.C.
Timothy Brown (*Pro Hac Vice Forthcoming*)
240 Townsend Square
Oyster Bay, NY 11771
Telephone: (516) 922-5427
Facsimile: (516) 344-6204
Email: tbrown@thebrownlawfirm.net

*Counsel for Plaintiffs Trent Nichols and
Sharon Nichols*